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September 1, 2021

## **VIA ELECTRONIC FILING**

The Honorable Jocelyn G. Boyd Chief Clerk/Executive Director Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, SC 29210

**Re:** Self-Report

Docket Number: 2011-158-E

Dear Ms. Boyd:

I am writing to inform the Public Service Commission of South Carolina (the "Commission") of three incidents in which certain Customer Information pertaining to Duke Energy Carolinas, LLC ("DEC" or the "Company") customers was disclosed in error. The circumstances of the disclosures are described below.

1. On January 11, 2021, a DEC customer in North Carolina reported that they were able to see a South Carolina DEC customer's account on their My Account profile, including the South Carolina customer's name, account number, meter number, address and phone number associated with the account, email address, amount due, billing and payment history, usage analysis, payment options, and partial bank account number. On January 12, 2021, the account was removed from the North Carolina customer's My Account profile.

The Company conducted an investigation and was unable to identify a specific root cause. However, the Company believes the issue was likely a result of a human performance entry error.

2. On February 19, 2021, a DEC customer in South Carolina reported receiving a Home Energy Report email that contained information for another customer's account, including name, last four (4) digits of the customer's utility account number, partial service address, home specific information, and the previous thirteen (13) months of energy usage history. The Home Energy Report email was sent to the customer on February 15, 2021.

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The Company conducted an investigation and was unable to identify a specific root cause because associated customer call recordings were deleted per the Company's established retention schedules. However, the Company was able to determine that the incident linking the two accounts likely occurred due to a single human performance error. Both customers involved in this incident are DEC customers who live in the same city and share the same first and last name. The accounts have been corrected.

3. On April 11, 2021, a DEC customer in South Carolina reported that the customer's account was incorrectly associated with another DEC customer. Each customer was able to see data elements belonging to the other customer through their My Account profile, including the customer's name, account number, meter number, address and phone number associated with the account, email address, amount due, billing and payment history, usage analysis, payment options, and partial bank account number.

The Company conducted an investigation and determined that the incident was due to a human performance error on the part of the Company's customer service representative who had copied the personal information of one customer's account to the other customer's account. The accounts were removed from the incorrect profiles and the information has been corrected, both in the legacy billing system and SAP. The customer service representative has received coaching to prevent this error in the future.

The North Carolina Code of Conduct was approved by the North Carolina Utilities Commission in its September 29, 2016 Order Approving Merger Subject to Regulatory Conditions and Code of Conduct, in Docket Nos. E-2, Sub 1095, E-7, Sub 1100 and G-9, Sub 682. It was further adopted, as applicable to South Carolina, via the Public Service Commission of South Carolina's Order No. 2016-772 dated November 2, 2016, and as updated in a filing made on October 9, 2018. The Code of Conduct contains several provisions relating to the disclosure of Customer Information. Customer Information means:

Non-public information or data specific to a Customer or a group of Customers, including, but not limited to, electricity consumption, natural gas consumption, load profile, billing history, or credit history that is or has been obtained or compiled by DEC, DEP or Piedmont in connection with the supplying of Electric Services or Natural Gas Services to that Customer or group of Customers.

If Customer Information is inappropriately disclosed, Section III(A)(2)(k) of the Code of Conduct provides the following:

Should any inappropriate disclosure of DEC, DEP or Piedmont Customer Information occur at any time, DEC, DEP or Piedmont shall promptly file a statement with the Commission describing the circumstances of the disclosure, the Customer Information disclosed, the results of the disclosure, and the steps taken to mitigate the effects of the disclosure and prevent future occurrences.

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In addition, Regulatory Condition No. 14.4 provides that such statements should be filed with the Commission(s). Pursuant to this Regulatory Condition and the above-cited provisions of the Code of Conduct, and after recently completing its investigation into the facts, DEC is filing this letter, in an abundance of caution, to report that Customer Information has been inappropriately disclosed, under the circumstances described above.

DEC takes its obligation to protect Customer Information very seriously and acted as quickly as possible to rectify this situation. For the foregoing reasons, the Company regrets the error.

Sincerely,

Katie M. Brown

cc: Nanette Edwards, Office of Regulatory Staff
Dawn Hipp, Office of Regulatory Staff
Jeff Nelson, Office of Regulatory Staff
Andrew Bateman, Office of Regulatory Staff